

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS**

JUDY FAHRNER, individually, and on behalf of  
all others similarly situated

Plaintiff,

V.

) Case No.: 13-cv-00227-MJR- SCW

RAYMOND BITAR; NELSON BURTNICK;  
FULL TILT POKER LTD.; TILTWARE LLC;  
VANTAGE, LTD; FILCO, LTD.; KOLYMA CORP.  
A.V.V.; POCKET KINGS LTD.;  
POCKET KINGS CONSULTING LTD.;  
RANSTON LTD.; MAIL MEDIA LTD.;  
HOWARD LEDERER; PHILLIP IVEY JR.;  
CHRISTOPHER FERGUSON; JOHNSON JUANDA  
JENNIFER HARMON-TRANIELLO;  
PHILLIP GORDON;ERICK LINDGREN; ERIK SEID  
ANDREW BLOCH; MIKE MATUSOW;  
GUS HANSEN; ALLEN CUNNINGHAM;  
PATRIK ANTONIUS; RAFAEL FURST;  
RATIONAL FT ENTERPRISES LIMITED

JURY TRIAL DEMANDED

Defendants.

**DEFENDANTS TILTWARE LLC AND ERIK SEIDEL'S  
MOTION TO DISMISS FIRST-AMENDED COMPLAINT,  
OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT**

COME NOW Defendants Tiltware LLC and Erik Seidel, by and through their counsel, Ifrah PLLC and Mathis, Marifian & Richter, Ltd., and hereby move to dismiss Plaintiff's First-Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(2) for lack of personal jurisdiction, 12(b)(6) for failure to state a claim, or, in the alternative, under Fed. R. Civ. P. 56 for summary judgment. A detailed memorandum in support is being filed contemporaneous to this Motion and is incorporated here by reference.

WHEREFORE, Defendants Tiltware LLC and Erik Seidel respectfully request that this Court grant their Motion and dismiss Plaintiff's First-Amended Complaint in its entirety as to them with prejudice, or, in the alternative, grant summary judgment in their favor.

Dated: March 14, 2013

MATHIS MARIFIAN & RICHTER, LTD.

By: /s/ William J. Niehoff

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Attorneys for Defendants,  
*Tiltware LLC and Erik Seidel*

**CERTIFICATE OF SERVICE**

This is to certify that a copy hereof was served upon all attorneys of record by electronic delivery via the CM/ECF System on this 14<sup>th</sup> day of March, 2013 addressed as follows:

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